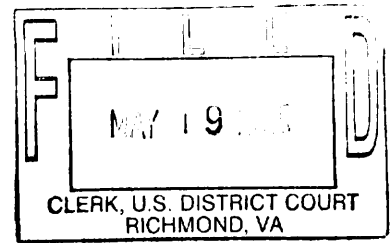


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division



UNITED STATES OF AMERICA

v.

JAMES DONOHUE,

Defendant.

) **UNDER SEAL**
)
) Criminal No. 3:15-CR- 094
)
)
)

MAY 2015 TERM - At Richmond

COUNT ONE

(Coercion and Enticement of a Minor)

From on or about January 2013, through on or about March 24, 2013, in the Eastern District of Virginia, and within the jurisdiction of this Court, JAMES DONOHUE, did, using any facility and means of interstate and foreign commerce, knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in any sexual activity for which a person can be charged with a criminal offense, to wit: Taking Indecent Liberties with Children, in violation of the 1950 Code of Virginia, as amended, Section 18.2-370.
(In violation of Title 18, United States Code, Section 2422(b)).

FORFEITURE ALLEGATION

Pursuant to Rule 32.2 Fed. R. Crim. P., the defendant is hereby notified that upon conviction of the offense alleged in Count One of this Indictment, he shall forfeit any property, including firearms, involved in, used in or facilitating the commission of the offenses charged in Count One. Property subject to forfeiture includes, but is not limited to:

A Dell laptop, SN 36005934385

(In accordance with Title 18, United States Code, Section 2428.)

A TRUE BILL

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By:



Heather L. Hart
Assistant United States Attorney